

Rt Hon David Miliband MP
Minister of Communities and Local
Government, ODPM

Sustainable Development Foundation
C/o The Hub
4 Torrens St
London
NW1

cc Richard McCarthy,
Director General, Sustainable
Communities Group, ODPM

Tel: 07939 266 969
Email: george@sdfoundation.org.uk

cc Elliot Morley MP, Minister of State
(Climate Change and Environment),
DEFRA

22nd November 2005

Dear Sir,

Building Yesterday's Homes Tomorrow

We are writing to ask you re-consider the decision to restrict the scope of the energy requirements in the new Building Regulations (Part L conservation of fuel and power) due to be implemented in April 06. We offer our support for the original measures proposed in your June 05 consultation that will create a more carbon-efficient level playing field across the industry and tackle the vital issue of existing buildings.

The Government's latest review of progress on Climate Change reveals the urgency with which action is required. Buildings are responsible for approximately 50% of climate changing CO₂ emissions in the UK . Existing homes number 23 million, and are responsible for 60% of this figure.

The standards set by the Building Regulations (Part L) are fundamental to the Government's declared aims. Without their lead, the market will not deliver the energy efficiency improvements to buildings that are so desperately needed to meet the Government's 2001 manifesto commitment of a 20% cut in CO₂ emissions by 2010. We appreciate that the government intends a future review of existing buildings, but the 06 Building Regulations provide the opportunity to take action now. It is critical that these imminent regulations meet the urgent demands of climate change.

The original proposals were an important step in the right direction and we lend our full support to the implementation of them, in particular:

- Extensions to all buildings, not only to buildings over 1000m², to require consequential improvements from a prescribed list of energy efficiency measures.

This is a crucial and widely welcomed measure. We understand 81% of respondents supported the proposal (without a threshold) and the Government's own regulatory impact assessment identifies this as an extremely cost effective step.

- Energy efficiency requirements to apply to all conservatories, removing the new threshold for application only to conservatories of 30m² or more.

This is significant because modern use of conservatories dictates that they are frequently used throughout the year and therefore heated. The threshold excludes most projects thereby effectively removing the requirements.

- 25% improvement in U-values to be based on the 2002 baseline standard for linear thermal bridging set by the current regulations.

The new baseline used in the current draft means that the improvement has been reduced to an equivalent of only 18% improvement on 2002 standards. This represents a lost potential saving of 140,000 tonnes of CO₂ from the 500,000 savings of the original proposal.

Without a tough target there is little incentive for the large volume house builders to invest in the delivery of quality energy efficient homes. The up-front costs involved in investing in enhanced energy conservation present a major deterrent. Without a level playing field set at a high level of performance, companies will continue to be rewarded for inaction.

We welcome your response and will be pleased to have the opportunity to discuss this matter in person.

Yours sincerely

George Martin
Chairman
Sustainable Development
Foundation

Guy Thompson
Director
Green Alliance

Andrew Simmonds
Executive Officer
Association for
Environment Conscious
Building

Additional Signatories to this letter

Please see next page

This letter is also from:

<p>Robin Nicholson, Director, Edward Cullinan Architects</p> <p>Bill Gething, Partner Fielden Clegg Bradley, of Sustainability Advisor to the President, RIBA</p> <p>Michael Pawlyn, Associate Director, Grimshaw</p> <p>Paul King, One Million Sustainable Homes Campaign Director, WWF</p> <p>Robert Webb, Director, XCO2</p> <p>Peter Jones, Director, Biffa</p> <p>Kevin McCloud, Broadcaster and Journalist</p> <p>Neil May, Director, Natural Building Technologies</p> <p>Bill Watts, Partner, Max Fordham LLP</p> <p>Andy Ford, Director, Fulcrum Consulting</p> <p>Adam Poole, Engineering Relations</p> <p>Chris Twinn, Associate Director, Arup</p> <p>Pooran Desai, Director, BioRegional-Quintain</p> <p>Steff Wright, Gusto Homes</p> <p>Prof Terry Wyatt, Past President, CIBSE</p> <p>Mark Gatterell, Director, Centre for Sustainable Engineering, Birmingham University</p> <p>Prof Sue Roaf, Dept of Architecture, Oxford Brookes University</p> <p>Paul Monaghan, Head of Sustainable Development, Co-operative Financial Services</p> <p>Hazel McKay, Chair, Sustainable Development Committee, Construction Industry Council.</p> <p>Yasmin Shariff, Partner, Dennis Sharp Architects</p> <p>John Willoughby, Independent Consultant</p> <p>Steve Charter, Sustainability Consultant</p> <p>Jim Blackburn, Managing Director, The Timber Frame Company Ltd.</p> <p>Lucy Pedlar, Green Register</p>	<p>Bill Dunster, Director, Zed Factory</p> <p>Nick Grant, Principal, Elemental Solutions, Building Design Consultant</p> <p>Bob Tomlinson, Director, Living Villages</p> <p>Peter Holden, Director, Lifehaus PLC</p> <p>Mark Shorrocks, Director, Living Places</p> <p>Paul Bellack, Director, Ethical Property Company</p> <p>Pamela Parkinson, Ecology Building Society</p> <p>Antony Turner, Director, CarbonSense</p> <p>Jon Broome, Director, Sustainability Works</p> <p>Dave Hampton, The Carbon Coach</p> <p>Jon Bootland, Director, Sustainable Development Corporation</p> <p>Suzy Edwards, Independent Sustainable Construction Consultant</p> <p>David Collins, Researcher, University of Surrey</p> <p>Liam Dewar, Director, Eurban</p> <p>Ben Pentreath, Director, Working Group</p> <p>Julian Brookes, Green Moves UK Ltd</p> <p>Chris Watts, Beyond Green</p> <p>Chris Herring Director, Green Building Store</p> <p>Andrew M Pettifer, Director, Gifford</p> <p>Sonny Masero, Director, Sponge Sustainability Network</p> <p>Charles Couzens, Director, Somerset Trust for Sustainable Development</p> <p>Gareth Walton, Director, Devon Sustainable Building Initiative</p> <p>Giles Frampton, Managing Director, Ecoconstruction Ltd.</p> <p>Liz Reason, Director, r2bc Ltd</p> <p>Ann Heywood, Principle Purpose</p>
--	--